

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors. <sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION TO INFORM AMERINATIONAL COMMUNITY SERVICES, LLC'S  
APPEARANCE AT THE DECEMBER 11-12 OMNIBUS HEARING**

COMES NOW AmeriNational Community Services, LLC (hereafter "AmeriNat") as servicer for the GDB Debt Recovery Authority (the "DRA") authorized to pursue and enforce the DRA's rights and remedies in any legal proceeding, including the DRA's participation as a creditor in the instant Title III case, by and through the undersigned legal counsel, and respectfully submits this motion in compliance with the Court's *Order Regarding Procedures for Attendance, Participation and Observation of December 11-12, 2019 Omnibus Hearing* (the "Scheduling Order") (Dkt. No. 9388):

1. Nayuan Zouairabani and/or Rosamar Garcia of McConnell Valdés, LLC will appear on behalf of AmeriNat at the December 11-12 omnibus hearing (the "Hearing"). Counsel

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Zouairabani and/or Garcia will appear in person in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767.

2. Counsel Zouairabani and/or Garcia may present argument related to the *Interim Report and Recommendation of the Mediation Team* (the “Interim Report”) (Docket No. 9365), as well as any related responses or replies to the Interim Report.

3. Counsel Zouairabani and/or Garcia further reserve the right to present oral argument in connection with the pleadings to be identified in the Hearing’s agenda (which has yet to be filed) to the extent that any of these pleadings either relate to, or affect, AmeriNat and/or the DRA’s rights in the Title III proceedings, or otherwise respond, as necessary, to any statements made by any party at the Hearing as to any related matters of the instant Title III case

**WHEREFORE**, AmeriNat respectfully requests the Court to take note of the foregoing, and deem AmeriNat in compliance with the Scheduling Order (Dkt. 9388).

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 5<sup>th</sup> day of December, 2019.

**MCCONNELL VALDÉS LLC**

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**WE HEREBY CERTIFY** that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this case, and that we served the foregoing upon all the Standard Parties as identified and defined at ¶ II(A) of the Court's *Tenth Amended Notice, Case Management, and Administrative Procedures* (Dkt. No. 8027 of Case No. 17-03283 (LTS)).